

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION**

DOUGLAS HANDSHOE

PLAINTIFF

V

CIVIL ACTION NO. 1:15CV382-HSO-JCG

**VAUGHN PERRET, CHARLES LEARY
& DANIEL ABEL, D/B/A TROUT
POINT LODGE LTD OF NOVA SCOTIA
& IN THEIR INDIVIDUAL CAPACITIES,
PROGRESS MEDIA GROUP LIMITED,
MARILYN SMULDERS, TORSTAR CORPORATION,
NATIONAL GEOGRAPHIC SOCIETY INC.,
& THE ASHOKA FOUNDATION**

DEFENDANTS

**MOTION FOR EXTENSION OF TIME TO
FILE A RESPONSIVE PLEADING**

COMES NOW Defendant, Ashoka, named herein as “The Ashoka Foundation,” by and through its undersigned counsel of record, Watkins & Eager PLLC, and appearing specially, and specifically reserving all defenses, including all defenses under Fed. R. Civ. P. 12(b), files this its Motion for Extension of Time to File a Responsive Pleading in this action and, in support thereof, would show unto the Court as follows:

1. The undersigned counsel was recently hired by Ashoka to represent it in this case.
2. Ashoka’s Answer and/or responsive pleading to the Second Amended Complaint is currently due to be filed on Thursday, July 14, 2016.
3. Due to the lengthy Complaint, the ongoing nature and extensive background of this litigation, and the schedule and workload of counsel, counsel for Ashoka respectfully requests an additional twenty-one (21) days to file an Answer and/or responsive pleading to Plaintiff’s Second Amended Complaint.

4. The undersigned counsel represents that this motion is not filed for purposes of delay, but in order that justice may be done.

WHEREFORE, PREMISES CONSIDERED, Defendant, Ashoka, named herein as “The Ashoka Foundation,” respectfully requests the Court to grant it an additional twenty-one (21) days, or until August 4, 2016, to file a responsive pleading to the Second Amended Complaint in the above action for the reasons stated herein.

Respectfully submitted, this the 13th day of July, 2016.

ASHOKA

By: WATKINS & EAGER PLLC

By: /s/ Douglas J. Gunn
Douglas J. Gunn

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CERTIFICATE OF SERVICE

I, Douglas J. Gunn, do hereby certify that I have this day electronically filed the foregoing with the Clerk of the Court using the ECF system, which sent notification of such filing to all counsel of record who have registered with the ECF system.

This the 13th day of July, 2106.

/s/ Douglas J. Gunn
Douglas J. Gunn